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Ser 1831.2/L7202
20 Jun 1997

Mr. James Ricks
United States Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Subj: RESPONSE TO THE UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY COMMENTS ON THE PRE DRAFT ENGINEERING
EVALUATION/COST ANALYSIS FOR SITE 15 AND THE PRE DRAFT EE/CA
FOR SITE 16 AT THE NAVAL AIR STATION, ALAMEDA

Dear Mr. Ricks:

Enclosed are responses to your 16 June 1997 FAXED comments on the Site 15 Engineering
Evaluation/Cost Analysis (EE/CA) and Site 16 EE/CA documents.

Your questions are in bold print with responses following in normal print.

If you have any questions, please contact Mr. George Kikugawa, Code 1831.2, at
(415) 244-2549, or Mr. Dennis Wong, Code 1831.3, at (415) 244-2526, FAX (415) 244-2654.

Sincerely,

Original signed by:

CAMILLE GARIBALDI
Lead Remedial Project Manager
By direction of
the Commanding Officer

Copies to:
NAS Alameda (Attn: Mr. Steve Edde)
Dept of Toxic Substances Control, Region 2 (Attn: Mr. Tom Lanphar)
Regional Water Quality Control Board (Attn: Ms. Lynn Suer)

Attachment: Response to USEPA comments

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20 Jun 1997

Subj: RESPONSE TO THE UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY COMMENTS ON THE PRE DRAFT EE/CA (ENGINEERING
EVALUATION/COST ANALYSIS) FOR SITE 15 AND THE PRE DRAFT EE/CA
FOR SITE 16 AT THE NAVAL AIR STATION, ALAMEDA

Blind copies to:

MOJU (Attn: Mr. Akali Igbene)

IT Corp. (Attn: Gary Elston)

PRC Environmental Management, Inc. (Attn: Mr. Duane Balch)

1831, 1831.2, 1831.3, 1831 File

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Administrative Record (3 copies)

Writer: George Kikugawa, 1831.2GK, X2549

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Act. File: NAS ALAMEDA (File: L7202GK.DOC) ab

**RESPONSE TO USEPA COMMENTS
Pre-Draft EE/CA for Sites 15**

SITE 15 DRAFT ADDENDUM EE/CA

I. General Comments on ARARs

- 1. The section on ARARs is very confusing.**

Response: Revisions have been made to the text to organize and clarify the ARARs in response to the comments by the USEPA. A list of acronyms has been included in the EE/CA document..

- 2. The ARARs section should separate “applicable” and “relevant and appropriate” requirements.**

Response: The ARARS sections have been separated.

- 3. Include reference to the statutes listed in the section beginning on Page 3-2. Include a table of acronyms in the document.**

Response: Cross referencing of statutes and regulations with regulations having specie CFR references have been included.

- 4. Throughout the ARARs discussion, citations are incomplete and/or much too broad.**

Response: see response to Comment 3

- 5. Reorder the section on ARARs to reflect chemical vs. action specific and which ARARs apply to which alternatives.**

Response: This is not actually possible as, for example CERCLA, includes all of the above types of ARARs. However, general descriptions of why each ARAR is included is in the introductions to the sections and within each individual ARAR description.

- 6. There should be a statement that there are no unique site features which would trigger ARARs, if applicable.**

Response: The ARARs have been revised to include only those ARARs which respond to a site condition or feature.

- 7. Explain in more detail Table 3-1. Why are commercial PRGs used in some places and residential in others? What is the document or source for the CAL PRGs? What is Title 22 STLC? Is “Goal of Treatment for on-site placement” applicable only to Alternative 2?**

Response: Table 3-1 is actually referred to in section 3.2. Table 3.1 will be included in front of Section 3.4 avoid confusion.

- 8. Edit table on page 3-3.**

Response: Requested revisions have been made.

9. Clarify the discussion on TBCs.

Response: The use of the term “to be considered” has been deleted as appears to have confused the discussion of the subject matter.

10. It is not stated whether the state has submitted state ARARs or what efforts have been made to identify state ARARs.

Response: The state has reviewed the pre-draft EE/CA and requested revisions by the state have been incorporated. USEPA should coordinate with CALEPA to determine the states requirements.

11. There should be a listing of administrative and substantive requirements which are not ARARs but are determined to be applicable to off-site actions.

Response: These have been included, but as ARARs as they effect how the removal action will be conducted.

12. Discussed whether compliance with the ARARs listed is deemed to be practicable.

Response: This discussion is not necessary as the required actions are described with each ARAR.

13. Discuss what the requirements of each ARAR is, and why it applies. Discuss why state ARARs were chosen over federal ARARs in some of the cases.

Response: Required actions have been included with the description of each ARAR. State ARARs are selected where they are more stringent or restrictive than federal ARARs.

II. Comments on specific ARARs.

1. TSCA regulations. Cite the subsection on PCB limit for backfill. Reference this section on Table 3-1.

Response: Revised text cites TSCA in Section 2.3 “For the soil to be a TSCA waste the soil would have to contain 50 ppm or more of PCBs (40 CFR Part 761.60 © (3) and (d). As the maximum concentration of PCBs found in TSTA soil is 5.9 ppm, and the average is much less, the soil is not a TSCA regulated waste.” TSCA, based on the revised text, does not apply to clean-up levels for this removal action.

2. National Primary and Secondary Ambient Air Quality Standards. Cite the specific subsection, as above. Explain PM-10. Explain why air monitoring “may be required”.

Response: the specific subsection is cited in the revised text. PM-10 will be included in the new list of acronyms. Dust may be generated during soil excavation. To demonstrate that the dust does not exceed regulatory levels monitoring will be conducted.

3. California Environmental Health Standards for the Management of Hazardous Waste. Give citations to specific sections. Does this ARAR apply to Alternative 4 only?

Response: The section are cited in the revised text.

4. CERCLA 66268.29 and 66268.41 and .43. Shouldn't these be citations to the state CCR rather than CERCLA.

Response: The section citations have been corrected.

5. CCR Title 23— State WRCB, Chap. 15. Specific requirements should be stated and specific citations given.

Response: Required actions have been included with the description of each ARAR. The section are cited in the revised text.

6. CA Clean Air Act, BAAQMD Reg 2, 6, 11/Rule 1. State the requirements and clarify which alternatives these regulations apply to.

Response: Required general actions have been included with the description of each ARAR. The section are cited in the revised text.

7. CCR Title 8. Explain why OSHA rules are considered ARARs, if applicable.

Response: CAL and FED OSHA regulations are cited as they are referenced by CERCLA and state requirements for the removal action.

8. CA Health and Safety Code sec. 25356.1, 25358.9, 25323.1. If these sections are substantive and environmental, explain.

Response: The State of California believes they are substantiative.

9. USEPA Region IX PRGs. Explain the discrepancy between the USEPA PRGs, those on Table 3-1 and the Action Level Summary (page 3-4). Explain what the former PRGs mean.

Response: Table 3-1 is actually referred to in section 3.2. Table 3.1 will be included in front of Section 3.4 avoid confusion.

10. USEPA Guidance on Remedial Actions for Superfund Sites with PCB Contamination. Needs a more specific citation.

Response: The complete reference is in the Reference List at the end of the EE/CA. The list may have been left out of the Addendum EE/CA pre-draft document.

11. CAL-EPA PRG for lead. Identify the document this comes from, and explain why they are using a state rather than federal standard.

Response: The document is actually a spread sheet developed by CALLIOPE, developed to provide PRGS, and has been referenced as such in the revised EE/CA.

12. 40 CFR Part 264. If the Navy is adopting this as a TBC, explain why and list the standards.

Response: The revised EE/CA text states that this part of CFR does not apply as soil at the TSTA is not a RCRA hazardous waste.

13. CCR Title 14 Chapters 3 and 5. State specific citation and specific requirement, along with the alternatives to which this requirement applies.

Response: References to CCR Title 14 have been deleted as they applied only to the on-site disposal option, which is not the selected alternative.

EIA COMMENTS

**RESPONSE TO USEPA COMMENTS
Pre-Draft EE/CA for Sites 16**

Site 16 Draft EE/CA

I. General Comments on ARARs.

1. The sections on ARARs is confusing.

Response: Revisions have been made to the text to organize and clarify the ARARs in response to the comments by the USEPA. A list of acronyms has been included in the EE/CA document..

2. Having two ARARs section (Section 3.4 and Appendix B) is very confusing.

Response: Appendix B has been deleted.

3. The ARARs section should separate “applicable” and “relevant and appropriate” requirements.

Response: The ARARS sections have been separated.

4. Section 3.4 refers to the TSTA, which is not necessary for this EE/CA.

Response: The TSTA reference is deleted.

5. Some of the statutes and regulations (B-1 and 3-1) do not appear in the discussion of ARARs. Make specific reference to the relevant sections and subsections. Add a table of acronyms.

Response: Cross referencing of statutes and regulations with regulations having specific CFR references have been included.

6. Clarify citations.

Response: Cross referencing of statutes and regulations with regulations having specific CFR references have been included.

7. Reorganize the section on ARARs, making clear which are chemical vs. Specific ARARs, and which ARARs apply to which alternatives.

Response: This is not actually possible as, for example CERCLA, includes all of the above types of ARARs. However, general descriptions of why each ARAR is included is in the introductions to the sections and within each individual ARAR description.

8. State that there are no unique site features which would trigger ARARs if no location-specific ARARs were selected.

Response: The ARARs have been revised to include only those ARARs which respond to a site condition or feature.

9. Clarify Table 3-1. Give more specific citations to statutes.

Response: Table 3-1 is actually referred to in section 3.2. Table 3.1 will be included in front of Section 3.4 avoid confusion.

10. Re-locate Table on Page 3-4, and correct the dates.

Response: Figure 3-1 is actually referred to in section 3.3. Figure 3.1 will be included in front of Section 3.4 avoid confusion.

11. Re-do the discussion of the TBCs.

Response: The use of the term "to be considered" has been deleted as appears to have confused the discussion of the subject matter.

12. It is not stated whether the state has submitted state ARARs or what efforts have been made to identify state ARARs.

Response: The state has reviewed the pre-draft EE/CA and requested revisions by the state have been incorporated. USEPA should coordinate with CALEPA to determine the states requirements.

13. There should be a listing of administrative and substantive requirements which are not ARARs but are determined to be applicable to off-site actions.

Response: These have been included, but as ARARs as they effect how the removal action will be conducted.

14. Discuss whether compliance with the ARARs listed is deemed to be practicable.

Response: This discussion is not necessary as the required actions are described with each ARAR.

15. Discuss better what the requirements and its applications for each ARARs.

Response: This discussion is not necessary as the required actions are described with each ARAR

II. Comments on Specific ARARs.

1. TSCA regulations. Cite the subsection on PCB limit for backfill. Reference this section on Table 3-1.

Response: Revised text cites TSCA in Section 2.3 "For the soil to be a TSCA waste the soil would have to contain 50 ppm or more of PCBs (40 CFR Part 761.60 (c) (3) and (d). As the maximum concentration of PCBs found in TSTA soil is 5.9 ppm, and the average is much less, the soil is not a TSCA regulated waste." TSCA, based on the revised text, does not apply to clean-up levels for this removal action.

2. National Primary and Secondary Ambient Air Quality Standards. Cite the specific subsection, as above. Explain PM-10. Explain why air monitoring "may be required".

Response: The specific subsection is cited in the revised text. PM-10 will be included in the new list of

acronyms. Dust may be generated during soil excavation. To demonstrate that the dust does not exceed regulatory levels monitoring will be conducted.

3. California Environmental Health Standards for the Management of Hazardous Waste. Give citations to specific sections. Does this ARAR apply to Alternative 4 only?

Response: The section are cited in the revised text.

4. CERCLA 66268.29 and 66268.41 and .43. Shouldn't these be citations to the state CCR rather than CERCLA.

Response: The section citations have been corrected.

5. CCR Title 23— State WRCB, Chap. 15. Specific requirements should be stated and specific citations given.

Response: Required actions have been included with the description of each ARAR. The section are cited in the revised text.

6. CA Clean Air Act, BAAQMD Reg 2, 6, 11/Rule 1. State the requirements and clarify which alternatives these regulations apply to.

Response: Required general actions have been included with the description of each ARAR. The section are cited in the revised text.

7. CCR Title 8. Explain why OSHA rules are considered ARARs, if applicable.

Response: CAL and FED OSHA regulations are cited as they are referenced by CERCLA and state requirements for the removal action.

8. CA Health and Safety Code sec. 25356.1, 25358.9, 25323.1. If these sections are substantive and environmental, explain.

Response: The State of California believes they are substantive.

9. USEPA Region IX PRGs. Explain the discrepancy between the USEPA PRGs, those on Table 3-1 and the Action Level Summary (page 3-4). Explain what the former PRGs mean.

Response: Table 3-1 is actually referred to in section 3.2. Table 3.1 will be included in front of Section 3.4 avoid confusion.

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Response: The complete reference is in the Reference List at the end of the EE/CA. The list may have been left out of the Addendum EE/CA pre-draft document.

11. CAL-EPA PRG for lead. Identify the document this comes from, and explain why they are

using a state rather than federal standard.

Response: The document is actually a spread sheet developed by CALEPA, developed to provide PRGs, and has been referenced as such in the revised EE/CA.

12. SFBRWQCB policy for reuse of soil containing residual lead and/or PCBs. If it is a policy, it would appear to be a TBC rather than an ARAR. There needs to be a citation for this policy and an explanation for why a state policy is being used.

Response: This ARAR is not included in revised EE/CA text.

13. 40 CFR Part 264, requirements for construction of a CAMU. It appears to not be relevant to Site 16. If this CFR is adopted, explain why and list the standards.

Response: The revised EE/CA text states that this part of CFR does not apply as soil at the TSTA is not a RCRA hazardous waste.

14. CCR Title 14 Chapters 3 and 5 regarding waste management. This appears to apply to the on-site disposal alternative. There needs to be a specific citation and the requirement needs to be stated, along with the alternative to which this applies.

Response: References to CCR Title 14 have been deleted as they applied only to the on-site disposal option, which is not the selected alternative.

15. General Review Requirements. Clarify this section.

Response: This section has been substantially revised.